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October 1, 2024

VIA ELECTRONIC FILING

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Juana Leonor v. Costco Wholesale Corporation
Docket No. 1:23-cv-07244-LGS

Dear Judge Schofield:

This office represents defendant, Costco Wholesale Corporation ("Costco"), in the above-referenced matter. Along with Plaintiff's counsel, Joseph Sorce of Bragoli & Associates, P.C., we write to request a brief adjournment of the Pre-Motion Conference scheduled for October 16, 2024, and the corresponding time to file a pre-motion letter.

The parties completed the expert depositions earlier today, as scheduled. Now that expert discovery is complete, the parties are re-evaluating the potential for dispositive motions. In order to comply with the Amended Case Management Order any pre-motion letter would be due two weeks before the October 16, 2024, Conference, which is tomorrow, October 2, 2024.

As such, the parties request a two week adjournment of the Pre-Motion Conference and the deadline to submit a pre-motion letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sam P. Quatromoni', written over a horizontal line.

Samuel P. Quatromoni

CC: Joseph Sorce, Esq., Bragoli & Associates, P.C. (via ECF)

The application is untimely under the Court's Individual Rules but nevertheless is **GRANTED in part**. The deadline for the parties to file their pre-motion letter is **ADJOURNED to October 9, 2024**. The pre-motion conference scheduled for October 16, 2024, is **ADJOURNED to October 23, 2024 at 4:10 P.M.** The parties shall call (888) 363-4749 and enter the access code 558-3333.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 38.

Dated: October 3, 2024
New York, New York

A handwritten signature in black ink, appearing to read 'Lorna G. Schofield', written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE